

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

ROCHELLE GLASGOW, et al.,)	
)	CASE NO. 5:21-cv-02001
Plaintiffs,)	
)	
vs.)	JUDGE DAVID A. RUIZ
)	
DANIEL J. BEERS, et al.)	
)	
Defendants.)	
)	

**DEFENDANTS DRUZILLA J. ABEL AND DALE E. BELLIS’S
OPPOSITION TO PLAINTIFFS’ MOTION FOR LEAVE
TO FILE SUPPLEMENTAL PLEADING PURSUANT TO RULE 15(d)**

Defendants Druzilla J. Abel and Dale E. Bellis join in the opposition to Plaintiffs’ motion for leave to file a supplemental pleading (ECF No. 96) and motion to strike filed by Defendant Gospel Light Mennonite Church Medical Aid Plan, Inc., d/b/a Liberty HealthShare (ECF No. 98). The arguments that Liberty makes in opposing Plaintiffs’ motion for leave apply with equal force to Abel and Bellis, and Liberty’s opposition is therefore incorporated herein by reference. In addition, the article referred to in Plaintiffs’ motion for leave does not affect any of the arguments that Abel and Bellis made in support of their motion to dismiss Plaintiffs’ claims of money had and received and conversion, which are the only claims that Plaintiffs brought against Abel and Bellis. (*See* Abel and Bellis Joint Mtn. to Dismiss, ECF Nos. 85 & 85-1.)

For these reasons, including those set forth in Liberty’s opposition to Plaintiffs’ motion for leave, Abel and Bellis request that the Court deny Plaintiffs’ motion.

Dated: March 21, 2023

Respectfully submitted,

/s/ Michael J. Zbiegien, Jr.

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CERTIFICATE OF SERVICE

A copy of the foregoing was filed electronically on March 21, 2023. Notice of this filing will be sent to all parties through the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Michael J. Zbiegien, Jr.

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*One of the Attorneys for
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